

Amy F. Sorenson, Esq.
Nevada Bar No. 12495
SNELL & WILMER L.L.P.
15 West South Temple, Suite 1200
Salt Lake City, UT 84101
Telephone: (801) 257-1900
Facsimile: (801) 257-1800
asorenson@swlaw.com

Kelly H. Dove, Esq.
Nevada Bar No. 10569
Gil Kahn, Esq.
Nevada Bar No. 14220
SNELL & WILMER L.L.P.
1700 South Pavilion Center Drive, Suite 700
Las Vegas, NV 89135
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
kdove@swlaw.com
gkahn@swlaw.com

*Attorneys for Defendants Apartment Management
Consultants, LLC, and Rene Richardson*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA *ex rel.*
PEGGY THORNTON, Relator,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC, a
foreign limited-liability company; TMIF II
PORTOLA, LLC, a foreign limited-liability
company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company; and RENE
RICHARDSON, as AGENT of PORTOLA
DEL SOL OPERATOR, LLC,

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**Stipulation and Order to Extend Deadline
for Plaintiff Peggy Thornton and
Defendants Apartment Management
Consultants, LLC and Rene Richardson to
submit Reply supporting their Joint
Motion to Approve Settlement and
Distribution of Settlement Funds
[ECF No. 124]**

(Sixth Request)

Defendants Apartment Management Consultants, LLC and Rene Richardson (collectively “AMC”); Defendant TMIF II Portola, LLC (“TMIF”); Plaintiff-Relator Peggy Thornton; and Real Party in Interest the United States of America, by and through their respective undersigned counsel, hereby stipulate to extend Ms. Thornton and AMC’s deadline to submit their reply in support of their joint motion to approve settlement and distribution of settlement funds (“Joint Motion”) by 30 days until **July 2, 2025**, in order to **finalize and execute** their settlement agreement, with the following background and reasons:

1. Ms. Thornton and AMC submitted the Joint Motion (ECF No. 124) on January 8, 2025.

2. As explained in the Joint Motion, Ms. Thornton and AMC have agreed on a settlement amount to resolve claims against the latter but required Court approval given that the United States had not stated whether it had any objection to the settlement terms.

3. The United States subsequently filed a partial objection to the Joint Motion, stating that it does *not* ultimately object to settlement or the settlement amount but requires any settlement to conform to its specifications, including distribution of settlement funds directly to the United States. ECF No. 128.

4. The United States, Ms. Thornton, and AMC have since conferred and agreed to jointly work on a written settlement agreement based on the Government’s specifications.

5. Because the settlement agreement will moot the need for the Court to approve the settlement and to accommodate the time needed to complete that agreement, the United States, Ms. Thornton, and AMC stipulated to extend the time for Ms. Thornton and AMC to reply to the Joint Motion to February 20, 2025. ECF Nos. 131-32.

6. Shortly after the Court approved that stipulation, TMIF submitted its own “limited opposition” to the Joint Motion. ECF No. 133.

7. To likewise accommodate drafting the settlement agreement, Ms. Thornton, AMC, and TMIF stipulated to extend Ms. Thornton and AMC’s reply deadline (with respect to TMIF’s limited opposition) to February 20, 2025 – thus aligning with the deadline as to the Government’s limited objection. ECF No. 134-35.

8. The Government circulated a proposed settlement agreement shortly thereafter, and Ms. Thorton and AMC obtained several stipulated extensions of their reply deadline to address proposed edits with the Government. They successfully sought the last stipulated extension to work through two remaining provisions. ECF No. 143.

9. **Since that last stipulated extension**, counsel for the Government, AMC, and Ms. Thornton have conferred numerous times, have reached agreement regarding the scope of the two remaining provisions, and are sending the agreement to their respective clients for final approval.

10. They now seek what they anticipate will be the final extension needed to finalize and execute the settlement agreement, which will result in a stipulated dismissal of AMC from this action.

11. Ms. Thornton, AMC, TMIF, and the United States agree that this stipulation is entered into in good faith and will not unduly delay proceedings.

IT IS SO STIPULATED.

Dated: June 2, 2025

SNELL & WILMER L.L.P.

By: /s/ Gil Kahn

Amy F. Sorenson, Esq.
Nevada Bar No. 12495
Kelly H. Dove, Esq.
Nevada Bar No. 10569
Gil Kahn
Nevada Bar No. 14220
1700 South Pavilion Center Drive,
Suite 700
Las Vegas, NV 89135

*Attorneys for Defendant Apartment
Management Consultants, LLC and Rene
Richardson*

Dated: June 2, 2025

NEVADA LEGAL SERVICES

By: /s/ Kristopher Pre

Kristopher Pre
Nevada Bar. No. 14106
530 South 6th Street
Las Vegas, Nevada 89101

Attorneys for Relator

1 Dated: June 2, 2025

Dated: June 2, 2025

2 U.S. ATTORNEY'S OFFICE
3 FOR THE DISTRICT OF NEVADA

McDONALD CARANO LLP

4 By: /s/ Christian Ruiz
5 Sigal Chattah
Interim United States Attorney

By: /s/ Karyna Armstrong
Rory T. Kay (NSBN 12416)
John A. Fortin (NSBN 15221)
Karyna M. Armstrong (NSBN 16044)
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102

6 Christian R. Ruiz
7 Assistant United States Attorney
501 Las Vegas Blvd., So., Suite 1100
8 Las Vegas, Nevada 89101

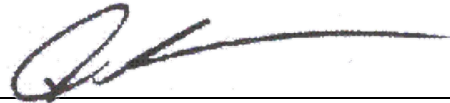
Attorneys for Defendant TMIF II Portola, LLC

9 *Attorneys for Real Party in Interest*
10 *the Unites States of America*

ORDER

11 Good cause appearing, Ms. Thornton and AMC's stipulation is **GRANTED**.
12 Ms. Thornton and AMC's deadline to submit a reply in support of their Joint Motion (ECF
13 No. 124), with respect to both the United States' partial objection (ECF No. 128) and TMIF's
14 limited opposition (ECF No. 133), is extended to and including July 2, 2025.

15 **IT IS SO ORDERED.**

16
17 

18 CHIEF UNITED STATES DISTRICT JUDGE

19 DATED: June 3, 2025

20
21
22 4928-1849-3513
23
24
25
26
27
28